## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LISA LAMBERT,

CIVIL ACTION NO: Plaintiff, 96 CV. 247 Erie

Judge Sean J. McLaughlin v. Magistrate Judge BAXTER

SUPERINTENDENT WILLIAM WOLFE, :

(Filed via ECF) et al.,

Defendants.

## **MOTION FOR EXTENSION OF TIME** TO FILE PRETRIAL MEMORANDA

Plaintiff Lisa Lambert respectfully moves for an extension of time for parties to file Pretrial Statements thirty (30) days after the scheduled Settlement Conference on August 23, 2007. Plaintiff therefore requests an extension for Plaintiff to file pretrial statements on September 24, 2007 and for Defendants to file pretrial statements on October 15, 2007.

- 1. On June 25, 2007, the Court denied Defendants' Motion for Summary Judgment.
- 2. On July 10, 2007, the Court ordered that Plaintiff's Pretrial Statements are due on or before July 30, 2007, and that Defendants' Pretrial Statements are due on or before August 20, 2007.
- 3. On July 11, 2007, the Court ordered a Settlement Conference to be held on August 23, 2007.

- 4. Extending the time to file pretrial statements and memoranda until after the settlement conference promotes judicial economy because if the parties are able to settle the case, the pre-trial documents will not be necessary.
- 5. Robert Willig, defendant for Defendants, concurs in this motion.

Therefore, Plaintiff Lambert requests an extension of time for Plaintiff to file pretrial statements on September 24, 2007 and for Defendants to file pretrial statements on October 15, 2007.

Respectfully submitted,

/s/ Angus Love

Angus Love, ID# PA 22392 Pennsylvania Institutional Law Project 718 Arch Street, Suite 304S Philadelphia, PA 19106

T: (215) 925-2966 F: (215) 925-5337

DATE: July 11, 2007

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LISA LAMBERT,

CIVIL ACTION NO:

96 CV. 247 Erie Plaintiff,

Judge Sean J. McLaughlin v.

Magistrate Judge BAXTER

SUPERINTENDENT WILLIAM WOLFE, :

(Filed via ECF) et al.,

Defendants.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Plaintiff's Motion for Extension of Time To File Pretrial Memoranda was served upon the following via ECF on July 11, 2007 to:

Rob Willig Office of the Attorney General 564 Forbes Avenue 6<sup>th</sup> Floor, Manor Complex Pittsburgh, PA 15219

I hereby certify that a true and correct copy of Plaintiff's Plaintiff's Motion for Extension of Time To File Pretrial Memoranda was served upon the following via first class mail on July 11, 2007:

James Eicher 209 McConnell Road New Wilmington, PA 16152

> Respectfully submitted, /s/Angus Love

Angus Love, ID # 22392

Pennsylvania Institutional Law Project 718 Arch Street, Suite 304 South

Philadelphia, PA 19106 (215) 925-2966

DATE: July 11, 2007